

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C.

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In the Matter of

The Use of N11 Codes and Other  
Abbreviated Dialing Arrangements

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Federal Communications Commission  
Office of Secretary

CC Docket No. 92-105

COMMENTS OF DAVID J. NELSON

I am an advocate and a deaf person who has been involved with Telecommunication issues for the past 10 years, mostly on a local level. I serve on the boards of several local organizations such as the DC Association of Deaf Citizens (DCADC) and DeafPride. I am also DCADC's representative to the DC Telecommunication Relay Service Advisory Board (DC TRS Advisory Board) and a member of several national organizations serving the deaf. After the passage of the Americans with Disabilities Act (ADA), I worked with the DC Public Service Commission to create the DC Relay Service.

For the past 5 or so years, I have served on the DC TRS Advisory Board and worked with leaders in the telecommunication industry and other organizations. I attended the TRS Forum last month when an announcement was made on the availability of one n11 (711) code for access to the TRS. I was so delighted because I've been a supporter of using n11 for TRS.

I am submitting these comments to the FCC's First Report and Order and Further Notice of Proposed Rulemaking (FNPRM). I support the FCC making one of the n11 (711) codes available for

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quick access to the TRS. I've been a strong supporter of n11 ever since the National Association of the Deaf filed with the FCC. I wrote an informal letter of support and encouraged the DC TRS Advisory Board to support the n11 codes for quick access to TRS. However, I have one concern about using only one n11 for accessing the TRS -- to be used for both voice and TTY/ASCII users. I will address them later in my comments.

I can think of many reasons why I support the n11 code for quick access to TRS. Primarily, my job involves nationwide travel and it gets annoying to have to look up the state's TRS numbers. Also, I make calls around the country and it often becomes difficult for me to leave a message not knowing the person's TRS number if I don't have it right next to me. Just last week, I had to call one of our advisory board members and I had to leave a message with his secretary to call my office's voice number to let me know that he was ready for me to return a relay call. And, a few weeks ago, my supervisor was out one morning and my administrator, who normally takes my voice calls, was also out that day. I called in for technical repair to my printer and I had no way of knowing how the technical support office would be able to reach me because the technical support office is located out of state, and they have several offices around the country to arrange for a repair person to follow up. How can I leave a TRS number without knowing whether they will be able to call. Another is that my office gets calls from customers asking for information and assistance. When I am required to call, I get concerned about reaching an answering

machine or voice mail. My supervisor, who lives in Maryland (long distance call) and travels often, has to carry several TRS numbers in order to make a call to me at work or at home. The n11 is the solution!

My concern with the one n11 is that the speed of the TTY/ASCII connection to the TRS Center is very critical. If the non-TTY/ASCII users are allowed to use the same n11, which call will the TRS answer first? Will they answer the voice call first or will they answer the TTY call first? One of the TRS regulations requires that user calls be answered within 10 seconds and I don't see how this will work. Someone pointed out to me that the TRS will have their database profile of past calls to allow the TRS to determine how to answer the calls. I do not think the TRS's profile would be practical because of the mixed household users, difficulty in dealing with calls coming from PBXs (or trunk lines) that have past records of both voice and TTY/ASCII. This is why I wrote a letter for support of having two n11s to be set aside.

Assuming the FCC will not grant another n11 for the voice users, I will further explain my comments now. I urge the FCC to set up a summit meeting on a national level to further develop the implementation of the 711. The participants should include representatives from the deaf community who are involved with telecommunication issues, telephone industry representatives, the FCC, lawyers (boy, they will love me for asking them), independent network engineers, national organizations of the deaf and hard of hearing (i.e., National Association of the Deaf,

Self-Help of Hard of Hearing, Consumer Action Network, etc). In the meantime, the FCC should push the state PSC/PUCs to set up a task force to research and set a dialogue to educate each other (the participants should be similar to what I mentioned above). Perhaps the state task forces would be able to assist the national summit in their preparation on the implementation of the 711.

Another advantage in having the summit meeting and task force is to deal with a few important issues such as:

1. I understand from the U.S. Telecommunication Association that many of the small common carriers (most in rural areas) do not have the necessary equipment (I believe they were referring to Advanced Intelligent Network) in order to deal with the n11 and having them to upgrade the equipment would be very costly. We need to study and provide assistance to them as much as we can.
2. If any states or the FCC in their upcoming ruling on TRS (Docket CC 90-105) pave the way for Multivendoring TRS, how and what n11 can deal with the choice of which TRS to select. Personally, I want to pick my own TRS provider for my relay calls. I'm sure this can be done by notifying the common carriers of my TRS choice, but what about a "first time user" or a one time user (i.e. real estate agent). How should we deal with their need to call the TTY users? Should the n11 system allow for random TRS providers? Or should a call be defaulted to one TRS provider? What if I was at a friend's house and I needed

to make a relay call, but my friend's TRS provider isn't my choice, can I bypass it? By using a dedicated 800 number? (10 digits is too much to call the TRS of my choice! Perhaps 7 digits could be used?).


So many questions need to be answered first and I think having the summit and task force meetings would leave everybody with an understanding and mutual respect instead of fighting and hating each other.

#### CONCLUSION

Quick and easy access to the Telecommunication Relay Service is essential for ALL deaf and hard of hearing including children and non-hearing disabled individuals, which will allow all of us to be equal just as other telecommunication users.

Again, on behalf of the Deaf Citizens of the USA, we thank you from the bottom of our hearts. We all are looking forward to working with you and others.

Respectfully Submitted,

  
David J. Nelson  
Advocate

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909 F St., NE  
Washington, DC 20002  
202/544-8589 (TTY)

Enclosure: Diskette with WordPerfect 5.1 and ASCII formats